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March 4, 2013

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Easy Telephone Services Company Revised Compliance Plan; WC
Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On April 2, 2012, Easy Telephone Services Company dba Easy Wireless (“Easy”) submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ On May 23, 2012 and August 10, 2012, Easy revised its Compliance Plan to provide additional details and clarifications.

Easy has further revised its Compliance Plan to: (a) provide details regarding income eligibility documentation requirements (p. 7 and in Exhibits A and B); (b) describe how Easy meets its obligation to “deal directly” with Lifeline applicants (pp. 8-9); (c) clarify Easy’s process for de-enrollment of customers that fail to respond to the annual eligibility verification (p. 14); and (d) provide additional detail regarding its financial and technical qualifications in Section III.

Easy hereby re-submits its complete Compliance Plan with the above revisions. Based on the minor nature of these changes, Easy reiterates its request for expeditious approval of its Compliance Plan.

¹ See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

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This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Easy Telephone Services Company

cc: Jonathan Lechter
Alex Minard
Garnet Hanly
Michelle Schaefer

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Easy Telephone Services Company	

EASY TELEPHONE SERVICES COMPANY COMPLIANCE PLAN

Easy Telephone Services Company dba Easy Wireless (“Easy” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious treatment of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.²

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Easy will comply with 911 requirements as described below and it is

¹ The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Easy Wireless (dba). Easy uses the Easy Wireless dba to provide wireless service in Missouri, Arkansas, Kentucky and Oklahoma.

² See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.³

Easy will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.⁴ This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that Easy will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how the Company offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company’s Lifeline service plan offerings.

³ See *Lifeline Reform Order*, ¶ 368. Although Easy qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Easy will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income Fund, including in any state where the public utilities commission determines that Easy provides service using its own facilities for purposes of a state universal service program.

⁴ In addition, this Compliance Plan is consistent with the compliance plan filed by Global Connection Inc. of America. See Global Connection of America Inc. Compliance Plan, WC Docket Nos. 09-197, 11-42 (Apr. 30, 2012). The Global Connection compliance plan was approved on May 25, 2012. See Public Notice, DA 12-828.

ACCESS TO 911 AND E911 SERVICES⁵

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.⁶ Easy complied with these conditions before the effective date of the *Lifeline Reform Order*.

Easy will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available using the Company's wireline service and its wireless service from Easy handsets, even if the account associated with the handset has no minutes remaining.

The Company's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Telecom Service Bureau, Inc. ("TSB") as its underlying network provider/carrier, which resells the wireless services of Sprint Nextel. Sprint routes 911 calls from the Company's customers in the same manner as 911 calls from Sprint's own retail customers. To the extent that Sprint is certified in a given PSAP territory, this 911 capability will function the same for the Company. The Company also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Company transmits all 911 calls initiated

⁵ See Compliance Plan Public Notice at 3.

⁶ See *Lifeline Reform Order*, ¶ 373.

from any of its handsets even if the account associated with the handset has no remaining minutes.

With respect to its wireline services, the Company resells the services of AT&T and AT&T routes 911 calls from Easy's customers in the same manner as 911 calls from AT&T's own retail customers.

E911-Compliant Handsets. Easy will ensure that all handsets used in connection with its wireless Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. Easy uses phones from TSB and Sprint that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE⁷

A. Policy

Easy complies with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that

⁷ See Compliance Plan Public Notice at 3.

size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, Easy will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

More than 95 percent of Easy's customer enrollment is done in-person, as opposed to over the phone or the Internet. Easy often holds planned events at advertised locations. In addition, employees or agents ("Company personnel") may set up in specific neighborhoods at public areas where eligible customers are likely to be located. All enrollments are done electronically in real-time. Easy is now using the CGM, LLC enrollment application. Company personnel views each potential customer's government-issued photo identification and proof of eligibility to participate in the Lifeline program. The Company's agent then logs into Easy's enrollment database using a unique agent ID and password to enroll the customer using the process outlined in this Compliance Plan. The customer checks off each certification and signs the application form electronically. The information collected from the customer is entered into the Melissa Database to validate the address and is checked against Easy's database of Lifeline customers for any duplication. In addition, Easy checks each applicant against a pooled duplicates database established by CGM, LLC. To complete the order, an electronic Lifeline application form is attached to the account.

When the completed order is approved, the agent provides a handset to the customer and assists the customer to activate the phone. The customer must dial 611 and press 1 to activate. In addition, Easy requires that the customer sign a Customer Acknowledgement Form to answer

specific questions and act as a physical signature in part to acknowledge the electronic signature included on the electronic application form. The agent then assists the customer to make a test call using the handset. Customers are given a Frequently Asked Questions document that lists the Company's name, contact number and customer service information and describes how customers can check their account balance and purchase "top up" minutes. In addition, Easy does a duplicate screen across TSB clients prior to seeking reimbursement from the federal USF fund to guard against customer overlap.

As discussed in further detail in Section I.F. below, all Company personnel that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, including a compliance manual.

If Easy cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company personnel will review documentation establishing eligibility pursuant to the Lifeline rules.⁸ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

⁸ See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.⁹ Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.¹⁰

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.¹¹ If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.¹²

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by

⁹ See *Lifeline Reform Order*, ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

¹⁰ *Id.* and section 54.410(c)(1)(i)(B).

¹¹ See *Lifeline Reform Order*, ¶101; section 54.410(b)(1)(i)(B).

¹² See *id.*

checking the appropriate box on the application form.¹³ In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The Company will not retain a copy of this documentation, except where state rules require such retention.¹⁴ Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Easy will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel. In addition, an Easy employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement.

Further, Easy will not enroll customers at retail locations where Easy does not have an agency agreement with the retailer. Easy will require an agent retailer to have any employees involved in the enrollment process go through the standard Easy training process, same as it would for any other agent. By establishing agency relationships with all of its Company personnel, including future retail outlets, Easy meets the "deal directly" requirement adopted in the TracFone Forbearance Order.¹⁵

The Commission determined in the *Lifeline Reform Order* that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[l]icensees and other Commission regulatees are

¹³ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

¹⁴ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹⁵ See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket no. 96-45, Order, FCC 05-165, ¶19 (2005).

responsible for the acts and omissions of their employees and independent contractors.”¹⁶

Because Easy is responsible for the actions of all of its employees and agents, including those enrolling customers in any Easy owned or affiliated retail locations, and an Easy employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement, the Company will always “deal directly” with its customers to certify and verify the customer’s Lifeline eligibility.

De-Enrollment for Ineligibility. If Easy has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.¹⁷ A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form. If a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within five business days. Customers can make this request by calling the Company’s customer service number and will not be required to submit any documents.

C. Subscriber Certifications for Enrollment

Easy will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.¹⁸ The Company shares the Commission’s concern about abuse of the Lifeline program and is thus

¹⁶ *Lifeline Reform Order*, ¶ 110.

¹⁷ *See Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

¹⁸ *Lifeline Reform Order*, ¶ 61; section 54.410(a).

committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.¹⁹ Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size²⁰ or will be provided with the guidelines as part of the electronic enrollment process. Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile or electronic mail. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.²¹

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not

¹⁹ See Model Application/Certification Forms, included as Exhibit A. See Compliance Plan Public Notice at 3. Easy will not use an application/certification form for its wireline services because it is no longer taking on wireline customers.

²⁰ See Income Eligibility Worksheet, included as Exhibit B.

²¹ See *Lifeline Reform Order*, ¶ 123.

transfer his or her benefit to any other person.²²

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.²³

In addition, Easy will notify applicants for its prepaid services that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.²⁴

Information Collection. The Company will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient²⁵); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²⁶

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature

²² See *id.*, ¶ 121; section 54.410(d)(1).

²³ See section 54.405(c).

²⁴ See *Lifeline Reform Order*, ¶ 257.

²⁵ See *id.*, ¶ 87.

²⁶ See section 54.410(d)(2).

or interactive voice response recording,²⁷ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize the Company to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit. The applicant must also authorize the

²⁷ See *Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.²⁸

D. Annual Verification Procedures

Easy will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.²⁹ Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.³⁰

2012 Verification. Easy attempted to re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and reported the results to USAC by January 31, 2013.³¹ The Company contacted its subscribers via various methods, including text message to their Lifeline supported telephone, mail, phone, and email or other Internet communication. The notice explained the actions the customer had to take to retain Lifeline benefits, when Lifeline benefits were to be terminated, and how to contact the Company.

²⁸ See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. *See id.*

²⁹ *See Lifeline Reform Order*, ¶ 120.

³⁰ *See id.*, ¶ 145.

³¹ *See id.*, ¶ 130.

Verification De-Enrollment. Easy will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.³² The Company will send a single written notice explaining that failure to respond to the re-certification request within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the 30 days, the Company will de-enroll the subscriber within five business days.

E. Activation and Non-Usage

Easy will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service via Easy's website or by calling the Company's call center.³³ For activation of a handset provided to a new customer "in the field," successful applicants are provided a functioning handset and instructed to dial Easy's customer service number to complete the activation process. Such calls are free of charge to the applicant. To activate a handset provided to a successful applicant by mail, upon receipt of the handset, the applicant must contact Easy's customer service department and then press 1 to activate the service.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.³⁴ Subscribers can "use" the service by: (1) completing an

³² See *Lifeline Reform Order*, ¶ 142; section 54.54.405(e)(4).

³³ See *Lifeline Reform Order*, ¶ 257; section 54.407(c)(1). Although Easy's wireline service offerings are prepaid, the Company does assess and collect a monthly fee from each wireline subscriber. Each customer is required to prepay for the Lifeline service offering chosen each month or the service is disconnected. Therefore, Easy's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.

³⁴ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.³⁵

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and Easy will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.³⁶ The Company's wireline service offering assesses a monthly charge on the subscribers and, consequently, the requirements of this section do not apply.

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Company will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the database when it becomes available, Company personnel will emphasize the "one Lifeline phone per household" restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All Company personnel interacting with existing and potential Lifeline customers undergo training

³⁵ See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

³⁶ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan.

Further, Easy has taken a proactive approach to eliminating fraud amongst its agents and representatives. Easy's agents are tracked by GPS so Easy can track whether they are attending sales events when they submit new customers for enrollment electronically. Easy conducts quality control "shopping" at its events whereby an Easy representative will pose as a Lifeline customer and attempt to enroll in the Lifeline service without being eligible (e.g., without proof of eligibility or by stating that the person has Lifeline service already from another provider).

Database. When the National Lifeline Accountability Database ("National Database") becomes available, Easy will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.³⁷

One-Per-Household. Easy will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household³⁸ through the use of its application and certification forms discussed above, database checks and its marketing materials

³⁷ See *Lifeline Reform Order*, ¶ 203. The Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, the Company will update each subscriber's information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

³⁸ A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.³⁹ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁴⁰ Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.⁴¹

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. Easy will also ask each customer whether they are receiving Lifeline service from one of the other major Lifeline providers in the

³⁹ See *Lifeline Reform Order*, ¶ 78.

⁴⁰ *Id.* The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

⁴¹ See *Lifeline Reform Order*, ¶ 89.

state (e.g., SafeLink, Assurance). Finally, at the time of enrollment, Easy will check each applicant against a pooled duplicates database established by CGM, LLC.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, Easy will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) Easy Telephone Services Company's name (the ETC).⁴² These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.⁴³ This specifically includes the Company's websites (www.easyphoneservice.com and www.myeasywireless.com) and outdoor signage.⁴⁴ A sample of the Company's marketing materials is included as Exhibit C. Further, the Company's application/certification form will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

G. Company Reimbursements From the Fund

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, Easy will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking

⁴² See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

⁴³ *Id.*

⁴⁴ *Id.*

reimbursement.⁴⁵ In addition, the Company will keep accurate records as directed by USAC⁴⁶ and as required by new section 54.417 of the Commission's rules.

H. Annual Company Certifications

Easy will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁴⁷ (2) is in compliance with all federal Lifeline certification procedures;⁴⁸ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁴⁹

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).⁵⁰ Further, as discussed above, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁵¹

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,⁵² the company name, names of the company's holding company, operating companies and

⁴⁵ See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

⁴⁶ See section 54.407(e).

⁴⁷ See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

⁴⁸ See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

⁴⁹ See section 54.416(a)(3).

⁵⁰ See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

⁵¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁵² See section 54.422(c).

affiliates, and any branding (such as a “dba” or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁵³ Easy will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low-income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁵⁴ Finally, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.⁵⁵

I. Cooperation with State and Federal Regulators

Easy has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;⁵⁶
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and

⁵³ See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

⁵⁴ See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

⁵⁵ See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

⁵⁶ The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe⁵⁷ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

II. Description of Lifeline Service Offerings⁵⁸

Easy will offer its Lifeline service in the states where it is designated as an ETC⁵⁹ and throughout the coverage area of its underlying provider(s) TSB and Sprint. The Company's wireless Lifeline offering in Kentucky, Arkansas and Missouri will provide customers with an option of 100 or 250 anytime prepaid minutes per month at no charge.⁶⁰ The minutes for the 100 minute plan are automatically rolled over for 90 days. The minutes for the 250 minute plan do not roll over. Lifeline customers can purchase additional bundles of minutes in denominations of 100 minutes (\$5.00), 225 minutes (\$10.00), 500 minutes (\$20.00) or unlimited minutes (\$30.00). Top Up minutes do not roll over. Airtime "top-up" minutes are available for purchase at the Company's retail locations and on its website. Text messaging is available for the 100 minute plan at the rate of 3 texts per one voice minute.⁶¹ Additional information regarding the Company's plans, rates and services can be found on its websites (www.easyphoneservice.com and www.myeasywireless.com).

In addition to free voice services, the Company's Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting and Voicemail. All

⁵⁷ See section 54.405(e)(1).

⁵⁸ See Compliance Plan Public Notice at 3.

⁵⁹ The Company is designated as a wireline ETC in Florida and as a wireless ETC in Arkansas, Kentucky, Missouri and Oklahoma.

⁶⁰ The Oklahoma plan provides unlimited minutes.

⁶¹ Except for Oklahoma where text messaging is available at the rate of one text per one voice minute.

plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

Easy's prepaid wireline unlimited local Lifeline offering in Florida is as follows:

BASIC SERVICE	36.50 (plus tax)
PREMIER PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, AND CALL WAITING ID	\$38.50 (plus tax)
COMPLETE PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, CALLER WAITING ID, *69, 3-WAY, & CALL FORWARDING	\$48.50 (plus tax)
LIFELINE BASIC SERVICE	\$23.00 (plus tax)
LIFELINE PREMIER PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, AND CALL WAITING ID	\$25.00 (plus tax)
LIFELINE COMPLETE PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, CALLER WAITING ID, *69, 3-WAY, & CALL FORWARDING	\$35.00 (plus tax)

Easy is developing bundled packages of voice and broadband service.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁶²

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁶³ The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives

⁶² See Compliance Plan Public Notice at 3.

⁶³ See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Easy has been providing telecommunications services since 1999 and began providing Lifeline service in June, 2009. The Company generates substantial revenues from non-Lifeline services and, consequently, has not and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. As discussed in Section II *supra*, the Company provides Lifeline and non-Lifeline wireless and wireline services. Easy receives revenues from these services and also has access to capital from its investors. The Company has not been subject to enforcement sanctions related to the Low-Income Fund or ETC revocation proceedings in any state with the exception of Oklahoma where the commission staff filed a Show Cause Application against Easy on February 4, 2013 (Cause No. PUD 201300012). In addition, on March 16, 2011, Easy paid a \$106,000 voluntary contribution to the Florida Public Service Commission to settle allegations of unauthorized carrier changes with respect to Easy's wireline services in Florida. The unauthorized switches were apparently attributable to non-compliant conduct by a marketing agent of Easy's, which was terminated. As of February 9, 2011, Easy ceased using outbound calling agents in Florida. The Notice of Proposed Agency Action Order Approving Settlement Agreement⁶⁴ became final by Consummation Order on April 1, 2011⁶⁵ and the docket was closed administratively on June 22, 2011.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁶⁶ Easy certifies that it will comply with the service requirements

⁶⁴ See Docket No. 11—29-TX, Order No. PSC-11-0154-PAA-TX (Mar. 7, 2011).

⁶⁵ See Order No. PSC-11-0184-CO-TX (Apr. 1, 2011).

⁶⁶ Compliance Plan Public Notice at 3.

applicable to the support the Company receives.⁶⁷ The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. Easy's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's current Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service. The Company's wireline service offers unlimited local calling.

Easy also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS") for its wireless service offering. Easy, like most wireless carriers, does not differentiate domestic long distance usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁶⁸

With respect to Easy's wireline service offering, the Company will comply with Commission requirements to offer TLS. Presently, the Company meets this obligation by

⁶⁷ 47 C.F.R. § 54.202(a)(1).

⁶⁸ See *Lifeline Reform Order*, ¶ 230.

providing toll limitation service in the form of a pre-set domestic long distance limit at no additional charge to its landline customers.

IV. Conclusion

Easy submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan
Kelley Drye & Warren, LLP
3050 K Street, NW
Suite 400
Washington, D.C. 20007
(202) 342-8544

Counsel to Easy Telephone Services Company

March 4, 2013

EXHIBIT A



Wireless Lifeline Service Application and Certification

Return With Proof

KY

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Easy Wireless' (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer Application Information:

First Name Middle Initial	Last Name	Date of Birth (MM/DD/YY) / /
Residential Address w/ street name & Apt Number (PO Box cannot be accepted)		City / State / Zip Code
Billing Address (if different from Residential Address) (P.O. Box IS sufficient)		City / State / Zip Code
<input type="checkbox"/> Residential Address is Permanent (Must Choose One) <input type="checkbox"/> Residential Address is Temporary		<input type="checkbox"/> Service Is New (Choose One) <input type="checkbox"/> Service Is Conversion
Full Social Security Number or Full Tribal Number - -	Home Telephone / Contact Number () -	Email Address

Would you like to receive texts or emails from our company about new service offerings or promotions?

☐ Yes ☐ No This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ YES ☐ NO

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

- | | |
|---|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guideline |
| <input type="checkbox"/> Federal Public Housing Assistance Section 8 (FPHA) | <input type="checkbox"/> Bureau of Indian Affairs (BIA) General Assistance |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Tribally Administered TANF (TATNF) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | <input type="checkbox"/> Head Start (income-eligible only) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> National School Lunch Program's free lunch programs |

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

☐ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

Tribal eligibility:

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

Multiple households sharing an address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my

The Eligible Telecommunications Carrier is **Easy Telephone Services Company dba Easy Wireless**
P.O. Box 831717 Ocala, FL 34483-1717 Customer Service: 877-476-3451 Fax: 877-433-2161

household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature:

Date:

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return,
☐ Current income statement from an employer or paycheck stub,
☐ A Social Security statement of benefits,
☐ A Veterans Administration statement of benefits,
☐ A retirement/pension statement of benefits,
☐ An Unemployment/Workmen's Compensation statement of benefits,
☐ Federal or Tribal notice letter of participation in General Assistance, or
☐ A divorce decree, child support award, or other official document containing income information.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: ____/____/____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
☐ Medicaid
☐ Section 8 Federal Public Housing Assistance (FPHA)
☐ Supplemental Security Income (SSI)
☐ Temporary Assistance for Needy Families (TANF)
☐ Low Income Home Energy Assistance Program (LIHEAP)
☐ National School Lunch Program's free lunch program
☐ Bureau of Indian Affairs General Assistance (BIA)
☐ Food Distribution Program on Indian Reservations (FDPIR)
☐ Tribally Administered TANF (TATNF)
☐ Head Start (meet income qualifying standards) (Tribal)

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
☐ Prior year's statement of benefits (Last 4 Digits _____)
☐ Notice letter of participation (Last 4 Digits _____)
☐ Other official document evidencing participation:
Type: _____ Last 4 Digits _____



Wireless Lifeline Service Application and Certification

Return With Proof

OK

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Easy Wireless' (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ **By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.**

Customer Application Information:

First Name Middle Initial	Last Name	Date of Birth (MM/DD/YY) / /
Residential Address w/ street name & Apt Number (PO Box cannot be accepted)		City / State / Zip Code
Billing Address (if different from Residential Address) (P.O. Box IS sufficient)		City / State / Zip Code
<input type="checkbox"/> Residential Address is Permanent (Must Choose One) <input type="checkbox"/> Residential Address is Temporary		<input type="checkbox"/> Service Is New (Choose One) <input type="checkbox"/> Service Is Conversion
Social Security Number or Tribal Number - -	Contact Number () -	Email Address

Would you like to receive texts or emails from our company about new service offerings or promotions?

☐ Yes ☐ No This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ YES ☐ NO

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

- | | |
|--|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guideline |
| <input type="checkbox"/> Federal Public Housing Assistance Section 8 (FPHA) | <input type="checkbox"/> Vocational Rehabilitation (including hearing impaired) |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA) |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | <input type="checkbox"/> Tribally Administered TANF (TATNF) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Head Start (meet income qualifying standards) (Tribal) |
| <input type="checkbox"/> National School Lunch Program's free lunch programs | <input type="checkbox"/> OK Sales Tax Relief |

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

☐ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

Tribal eligibility:

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

Multiple households sharing an address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my

household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature:

Date:

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return,
☐ Current income statement from an employer or paycheck stub,
☐ A Social Security statement of benefits,
☐ A Veterans Administration statement of benefits,
☐ A retirement/pension statement of benefits,
☐ An Unemployment/Workmen's Compensation statement of benefits,
☐ Federal or Tribal notice letter of participation in General Assistance, or
☐ A divorce decree, child support award, or other official document containing income information.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: ____/____/____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
☐ Medicaid
☐ Section 8 Federal Public Housing Assistance (FPHA)
☐ Supplemental Security Income (SSI)
☐ Temporary Assistance for Needy Families (TANF)
☐ Low Income Home Energy Assistance Program (LIHEAP)
☐ National School Lunch Program's free lunch program
☐ Vocational Rehabilitation (including hearing impaired)
☐ Food Distribution Program on Indian Reservations (FDPIR)
☐ Bureau of Indian Affairs General Assistance (BIA)
☐ Tribally Administered TANF (TATNF)
☐ Head Start (meet income qualifying standards) (Tribal)
☐ OK Sales Tax Relief

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
☐ Prior year's statement of benefits (Last 4 Digits _____)
☐ Notice letter of participation (Last 4 Digits _____)
☐ Other official document evidencing participation:
Type: _____ Last 4 Digits _____

EXHIBIT B



Easy Telephone Services Company d/b/a Easy Wireless Wireless Lifeline Service Application Income Eligibility Worksheet

Individuals in all states are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

HOUSEHOLD SIZE	INCOME LEVEL
1	\$15,512
2	\$20,939
3	\$26,366
4	\$31,793
5	\$37,220
6	\$42,647
7	\$48,074
8	\$53,501
For each additional person	Add \$5,427

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- the prior year's state, federal, or Tribal tax return
- current income statement from an employer or paycheck stub
- a Social Security statement of benefits
- a Veterans Administration statement of benefits
- a retirement/pension statement of benefits
- an Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- a divorce decree, child support award, or other official document containing income information

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

This is a Lifeline service provided by Easy Telephone Services Company d/b/a Easy Wireless. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.

EXHIBIT C



Welcome to the Easy Wireless Family!

Easy Wireless provides FREE and discounted cell phone service to qualifying families and individuals. We believe having reliable cell phone service is a right, not a privilege and want to give you the freedom to communicate without having to lock you into long-term contracts and confusing plans. There are no gimmicks, no deposits, no credit checks.

With Easy Wireless, qualifying individuals receive a free cell phone, free monthly minutes, free Caller ID, free Call Waiting and free Voice Mail. **PLUS, we will give you a \$5.00 Gift Card for every eligible person you refer who activates service.** There is no limit to how many people you can refer each month.

Lifeline Service is limited to one benefit per household. You may not receive additional Lifeline discounts from another provider. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both. Your home address must be a permanent address. If a temporary address, you must verify the address every 90 days. Annual requests to verify continued eligibility must be responded to in a timely manner.

Lifeline is a government assistance program that is only available for one phone per household by law. Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Only eligible consumer may enroll in the program.

Lifeline Service is non transferable.

Frequently Asked Questions

How do I qualify?

You may qualify for Lifeline service if you participate in one or more of the following programs. Only eligible consumers may enroll.

- Medicaid
 - National School Lunch Free Program (residents of Tribal Lands only)
 - Federal Public Housing Assistance / Section 8
 - Supplemental Nutrition Assistance Program (SNAP)
 - Low Income Home Energy Assistance Program (LIHEAP)
 - Supplemental Security Income (SSI)
 - Temporary Assistance for Needy Families (TANF)
 - Tribally Administered TANF
 - Bureau of Indian Affairs General Assistance
 - Head Start (income qualifying/residents of Tribal Lands only)
 - OK Sales Tax Relief
 - Vocational Rehabilitation (including hearing impaired)
 - Income at or below 135% of Federal Poverty Guidelines
- **Proof of income or program participation such as an eligible program card or statement of benefits is required ****

Who is my Cell Phone Carrier?

The Eligible Telecommunications Carrier is Easy Telephone Services Company dba Easy Wireless.

Where is the service available?

Right now Easy Wireless is providing service in the state of Oklahoma

What is included in my package?

For as little as \$1, the Wireless plan comes with UNLIMITED Local and Long Distance Voice Service, as well as BOICE MAIL, CALL WAITING, and CALLER ID at no additional costs!

How can I purchase additional minutes?

Additional minutes can be purchased by calling customer service or 611.

If my phone is lost or stolen, how can I replace it?

Replacement handsets can be purchased by calling our Customer Service Department. It may take 7-10 business days for the replacement to be received.

How can I check my minutes?

To obtain this information please call our customer service department or dial 611.

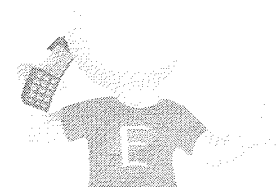
Can games and ringtones be downloaded?

Most phones come preloaded with games but at this time Easy Wireless does not provide data pages.

Before Using Your Phone, Please Verify That You Have Done The Following:

- Installed the battery into the handset
- Installed the battery door onto the handset
- Charged your phone for 2 to 4 hours

Your new phone should now be ready to use. If you need any additional assistance, please call 888-740-9728.



**** ONLY ONE LIFELINE SERVICE IS AVAILABLE PER HOUSEHOLD ****

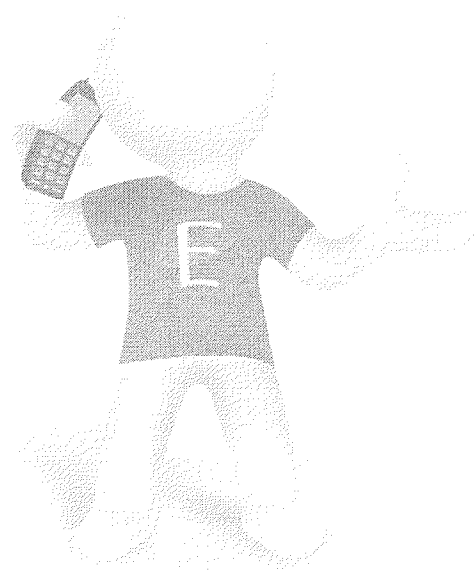
Call us toll free: 877.476.3451 or dial 611

EASTERN STANDARD TIME / MONDAY-FRIDAY 8:00AM-6:00PM

www.MyEasyWireless.com

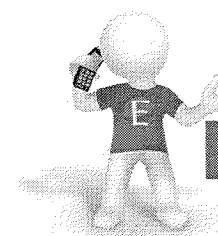
**Easy Telephone
Services Company dba
Easy Wireless**
Free Calls for everyone!

PO Box 831717 Ocala, FL 34483-1717
877.476.3451 • www.MyEasyWireless.com

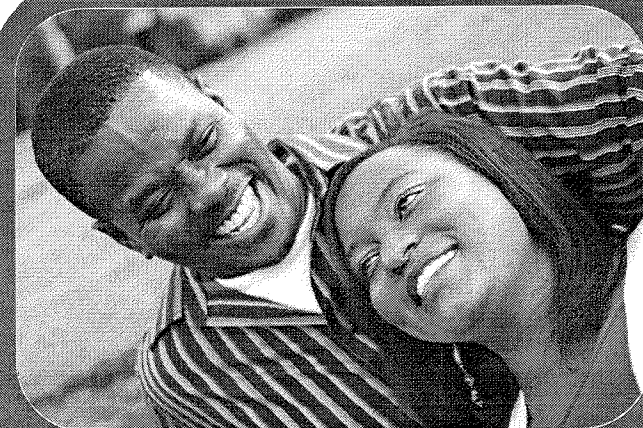


**Tell your eligible friends and
family about us and we'll give
you a \$5.00 gift card for
everyone who signs up!**

Any friends or family members referred that want Lifeline service must be eligible to receive Lifeline service and complete the enrollment process. If you are receiving Lifeline service, other members of your household will be not eligible to receive Lifeline service.



It's FREE when you see ME!
EASY WIRELESS



**Program
Information**

**Easy Telephone
Services Company dba
Easy Wireless**

**Receive a FREE Cell Phone
and Unlimited Monthly
Minutes!**